

EXHIBIT 32

1 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
2 EASTERN DIVISION
3 IN RE: NATIONAL) MDL No. 2804
PRESCRIPTION OPIATE)
4 LITIGATION) Case No.
1:17-MD-2804
5)
THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
6 ALL CASES)
)

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8
9
10 Friday, January 25, 2019
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12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW
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16 Videotaped Deposition of EUGENE G.
CAVACINI, held at Winstead PC, 2728 North
17 Harwood, Suite 500, Dallas, Texas, commencing
at 9:01 a.m., on the above date, before
18 Michael E. Miller, Fellow of the Academy of
Professional Reporters, Registered Diplomate
19 Reporter, Certified Realtime Reporter and
Notary Public.
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23
24 GOLKOW LITIGATION SERVICES
877.370.3377 ph | fax 917.591.5672
25 deps@golkow.com

1 they are willing to ship, right? That's
2 within the company's purview to decide,
3 right?

4 MS. HENN: Objection to form,
5 asked and answered.

6 A. But I think it is a balance
7 between making sure that these products are
8 available to patients who need them when they
9 need them, all the medications that we
10 provide.

11 You know, we are a distributor
12 and a logistics company that see orders from
13 pharmacies and pharmacists pursuant to
14 prescriptions. I don't think we should be
15 making clinical decisions. Under the --

16 BY MR. BOGLE:

17 Q. Well -- go ahead. Go ahead.
18 No.

19 A. Under the Controlled Substances
20 Act, we have a responsibility to make sure
21 that we have an effective program to guard
22 against controls and that we have a system to
23 alert orders that deviate in size, pattern
24 and frequency.

25 Q. Okay. And do you dispute that

ERRATA SHEET

Case Name: In re: National Prescription Opiate Litigation
No. 1:17-MD-2804

Deposition Date: January 25, 2019

Deponent: Gene Cavacini

- | | |
|----|---------------------------------|
| 1. | To clarify the record. |
| 2. | To conform to the facts. |
| 3. | To correct transcription error. |

Pg.	Line	Now Reads	Should Read	Reason
16	5	I described	I've described	3
18	13	relationship	relationships	3
19	4	so which	so it	3
25	14	I do	It does	1
27	3	masters	Masters	3
28	17	see a	see it as	1
32	24	ever day	everyday	3
45	6	a regulatory	regulatory	1
45	23	is an important	is important	1
50	11	answer of what	answer, what	3
58	19	that that	that	3
62	24	compare	company	3
66	4	came	that it came	1
73	14	failed	failing	1

78	22	at	in	3
101	8	was	were	1
116	6	about we	about how we	3
118	10	have	have them	3
157	22	post	past	3
161	9	about my	in my	3
163	25	compensation	component	3
194	10	20,000s	20,000	3
236	16	DA	DEA	3
254	2	Al--	Alverson	1
267	22	controls	diversion	2
311	15	drive	driver	3
315	6	vested	invested	3
329	7	act	Act	3
346	10	allocations	allegations	3
360	10	work out	work in	3

2.27.2019

Date



Gene Cavacini




Highly Confidential - Subject to Further Confidentiality Review

1 ACKNOWLEDGMENT OF DEPONENT

2
3 I, EUGENE G. CAVACINI, do hereby
4 certify that I have read the foregoing pages
5 and that the same is a correct transcription
6 of the answers given by me to the questions
7 therein propounded, except for the
8 corrections or changes in form or substance,
9 if any, noted in the attached
10 Errata Sheet.
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EUGENE G. CAVACINI

2.27.19

DATE

12 Subscribed and sworn to before me this
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15 27 day of February, 20 19.
16 My commission expires: 1.5.22

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Notary Public

